

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IN RE: AIR CARGO SHIPPING SERVICES	:	
ANTITRUST LITIGATION	:	MDL No. 1775
	:	
THIS DOCUMENT RELATES TO:	:	Master File 06-MD-1775 (JG)(VVP)
ALL ACTIONS	:	
	:	
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**STIPULATED [PROPOSED] DISCOVERY  
AND CLASS CERTIFICATION BRIEFING SCHEDULE<sup>1</sup>**

December 4, 2009	Defendants with an executed Letter Agreement with Plaintiffs provide responses to sections A(1) and A(2) of Letter Agreement.
December 4, 2009	Defendants without an executed Letter Agreement with Plaintiffs serve responses and objections to Plaintiffs' First Set of Requests for Production of Documents.
December 15, 2009	Plaintiffs accept or reject Defendants' production pursuant to Letter Agreement.
December 15, 2009 – February 15, 2010	All parties complete meet-and-confers concerning Transaction and Cost Information; and Plaintiffs and those Defendants without a Letter Agreement or whom Plaintiffs have rejected under a Letter Agreement complete meet-and-confers concerning unresolved issues re: Plaintiffs' First Set of Requests for Production of Documents.

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<sup>1</sup> In light of South African Airways, Ltd.'s proposed renewed motion to dismiss, South African Airways, Ltd. has not agreed to this scheduling proposal.

December 31, 2009	Defendants as to whom Plaintiffs have accepted a production pursuant to a Letter Agreement complete production of such documents (as set forth in each Defendant's Letter Agreement).
December 31, 2009	Defendants whom Plaintiffs have rejected under a Letter Agreement serve responses and objections to Plaintiffs' First Set of Requests for Production of Documents.
January 18, 2010 – February 5, 2010	Plaintiffs may seek to renegotiate discovery schedule at this time if Plaintiffs have not received substantially complete productions from a sufficient number of Defendants under a Letter Agreement.
March 1, 2010	Parties may file Motions to Compel Concerning Unresolved Issues.
March 15, 2010 – January 31, 2011	Party Depositions. Plaintiffs may take a total of 60 depositions of Defendants, excluding Rule 30(b)(6) depositions concerning Transaction and Cost Information, ESI, and depositions concerning experts. Defendants may take 20 depositions of Plaintiffs, excluding Rule 30(b)(6) depositions concerning Transaction and Cost Information, ESI, and depositions concerning experts. For good cause shown, the parties may seek to take additional depositions if needed during this period or thereafter. <sup>2</sup>
March 16, 2010	Responses to Motions to Compel.
March 26, 2010	Replies to Motions to Compel.
Date to be determined by Court	Hearing re: Motions to Compel and other matters.
April 1, 2010	Defendants without a Letter Agreement or whom Plaintiffs have rejected under a Letter Agreement produce documents to which there is no dispute.

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<sup>2</sup> This schedule does not place limits on depositions other than those of Defendants and named Plaintiffs, but each side reserves the right to seek protective orders as appropriate.

April 1, 2010 – June 1, 2010	Parties complete production of Transaction and Cost Information as agreed or determined by the Court.
January 31, 2011	Plaintiffs file their motion for class certification and make expert disclosures with underlying expert materials.
February 7, 2011	First date by which Plaintiffs make their class certification experts available for deposition -- deposition dates to be agreed upon by the parties.
May 30, 2011	Defendants file their opposition(s) to class certification and make expert disclosures with underlying expert materials.
June 6, 2011	First date by which Defendants make their class certification experts available for deposition -- deposition dates to be agreed upon by the parties.
August 1, 2011	Plaintiffs file their reply brief in support of class certification and make expert disclosures with underlying expert materials.
August 8, 2011	First date by which Plaintiffs make their class certification reply experts available for deposition -- deposition dates to be agreed upon by the parties.
August 15, 2011	All parties meet and confer concerning remaining discovery schedule, including additional depositions, summary judgment motions and trial.

Dated: November 12, 2009

Respectfully submitted,

/s/ Margaret M. Zwisler

Margaret M. Zwisler  
William R. Sherman  
LATHAM & WATKINS LLP  
555 Eleventh Street, N.W., Suite 1000  
Washington, D.C. 20004  
(202) 637-2200 (telephone)  
(202) 637-2201 (facsimile)  
*Counsel for Singapore Airlines Cargo Pte Ltd  
and Singapore Airlines Limited*

/s/ George F. Hritz

George F. Hritz  
HOGAN & HARTSON LLP  
875 Third Avenue  
New York, NY 10022  
(212) 918-3517 (telephone)  
(212) 918-3100 (facsimile)  
*Counsel for Air Canada and AC Cargo LP*

/s/ Ian Simmons

Ian Simmons  
O'MELVENY & MYERS LLP  
1625 Eye Street, N.W.  
Washington, D.C. 20006-4001  
(202) 383-5106 (telephone)  
(202) 383-5414 (facsimile)  
*Counsel for Asiana Airlines Inc.*

/s/ Daryl A. Libow

Daryl A. Libow  
SULLIVAN & CROMWELL LLP  
1701 Pennsylvania Avenue, N.W., Suite 800  
Washington, D.C. 20006  
(202) 956-7500 (telephone)  
(202) 293-6330 (facsimile)  
*Counsel for British Airways Plc*

/s/ James R. Warnot, Jr.

James R. Warnot, Jr.  
Thomas A. McGrath  
LINKLATERS LLP  
1345 Avenue of the Americas  
New York, NY 10105  
(212) 903-9000 (telephone)  
(212) 903-9100 (facsimile)  
*Counsel for Société Air France*

/s/ Charles J. Simpson, Jr.

Charles J. Simpson, Jr.  
ZUCKERT, SCOUTT & RASENBERGER, LLP  
888 Seventeenth Street, N.W., Suite 700  
Washington, D.C. 20006  
(202) 298-8660 (telephone)  
(202) 342-0683 (facsimile)  
*Counsel for All Nippon Airways Co., Ltd.*

/s/ Harvey J. Wolkoff

Harvey J. Wolkoff  
ROPES & GRAY, LLP  
One International Place  
(617) 951-7000 (telephone)  
(617) 951-7050 (facsimile)  
*Counsel for Atlas Air Worldwide Holdings, Inc.  
and Polar Air Cargo LLC*

/s/ Stephen Fishbein

Stephen Fishbein  
SHEARMAN & STERLING LLP  
599 Lexington Avenue  
New York, NY 10022  
(212) 848-4000 (telephone)  
(212) 848-7179 (facsimile)  
*Counsel for Cargolux Airlines International S.A.*

/s/ David H. Bamberger

David H. Bamberger  
Deana L. Cairo  
DLA PIPER LLP (US)  
500 Eighth Street, N.W.  
Washington, D.C. 20004  
(202) 799-4000 (telephone)  
(202) 799-5000 (facsimile)  
*Counsel for Cathay Pacific Airways Ltd.*

/s/ John M. Nannes

John M. Nannes  
Gary A. MacDonald  
SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP  
1440 New York Avenue, N.W.  
Washington, D.C. 20005-2111  
(202) 371-7000 (telephone)  
(202) 393-5760 (facsimile)  
*Counsel for KLM Royal Dutch Airlines*

/s/ James V. Dick

James V. Dick  
SQUIRE, SANDERS & DEMPSEY, LLP  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 407  
Washington, D.C. 20044-0407  
(202) 626-6600 (telephone)  
(202) 626-6780 (facsimile)  
*Counsel for LAN Airlines S.A., LAN Cargo S.A.  
and Aerolíneas Brasileiras S.A.*

/s/ William Karas

William Karas  
Kenneth P. Ewing  
STEPTOE & JOHNSON LLP  
1330 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
(202) 429-3902 (facsimile)  
*Counsel for Japan Airlines International Co., Ltd.*

/s/ Peter E. Halle

Peter E. Halle  
John Clayton Everett, Jr.  
MORGAN, LEWIS & BOCKIUS, LLP  
1111 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
(202) 739-3000 (telephone)  
(202) 739-3001 (facsimile)  
*Counsel for Korean Airlines Co., Ltd.*

/s/ John R. Fornaciari

John R. Fornaciari  
Robert M. Disch  
SHEPPARD, MULLIN, RICHTER &  
HAMPTON, LLP  
1300 I Street, N.W., 11<sup>th</sup> Floor East  
Washington, D.C. 20005  
(202) 218-0000 (telephone)  
(202) 218-0020 (facsimile)  
*Counsel for Nippon Cargo Airlines Co., Ltd.*

/s/ George D. Ruttinger

George D. Ruttinger  
CROWELL & MORING, LLP  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004-2595  
(202) 624-2500 (telephone)  
(202) 628-5116 (facsimile)

-and-

/s/ Michael F. Goldman

Michael F. Goldman  
SILVERBERG, GOLDMAN & BIKOFF, LLP  
1101 30th Street, N.W., Suite 120  
Washington, D.C. 20007  
(202) 944-3305 (telephone)  
(202) 944-3306 (facsimile)  
*Counsel for Scandinavian Airlines System*

/s/ George N. Tompkins, Jr.

George N. Tompkins, Jr.  
WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP  
150 East 42nd Street  
212 490 3000 (telephone)  
212 490 3038 (facsimile)  
*Counsel for Air China Limited and Air China  
Cargo Company Limited*

/s/ Terry Calvani

Terry Calvani  
FRESHFIELDS BRUCKHAUS DERINGER LLP  
701 Pennsylvania Ave., NW, Suite 600  
Washington, D.C. 20004  
(202) 777-4505 (telephone)  
(202) 777-4555 (facsimile)

-and-

/s/ David E. Everson

David E. Everson  
STINSON MORRISON HECKER LLP  
1201 Walnut Street  
Kansas City, MO 64106  
(816) 842-8600 (telephone)  
(816) 691-3495 (facsimile)  
*Counsel for Emirates*

/s/ David B. Anders

David B. Anders  
WACHTELL, LIPTON, ROSEN & KATZ  
51 West 52nd Street  
New York, New York 10019  
(212) 403-1307 (telephone)  
(212) 403-2307 (facsimile)  
*Counsel for El Al Israel Airlines Ltd.*

/s/ W. Todd Miller

W. Todd Miller  
Kimberly N. Shaw  
BAKER & MILLER PLLC  
2401 Pennsylvania Ave., NW Suite 300  
Washington, D.C. 20037  
(202) 663-7820 (telephone)  
(202) 663-7849 (facsimile)  
*Counsel for Qantas Airways Limited*

/s/ Ryan Blanch

Ryan Blanch  
THE BLANCH LAW FIRM, P.C.  
261 Madison Avenue, 12th Floor  
New York, New York 10016  
(212) 736-3900 (telephone)  
(646) 453-1190 (facsimile)  
*Counsel for Saudi Arabian Airlines Corporation*

/s/ Michael J. Holland

Michael J. Holland  
CONDON & FORSYTH LLP  
7 Times Square, 18<sup>th</sup> Floor  
New York, NY 10036  
212 490 9100 (telephone)  
212 370 4453 (facsimile)  
*Counsel for Air New Zealand Limited*

/s/ Michael D. Hausfeld

Michael D. Hausfeld  
William P. Butterfield  
Brent W. Landau  
HAUSFELD LLP  
1700 K Street, Suite 650  
Washington, DC 20006  
(202) 540-7200 (telephone)  
*Plaintiffs' Lead Counsel*

/s/ Daniel G. Swanson

Daniel G. Swanson  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, California 90071-3197  
(213) 229-7000 (telephone)  
(213) 229-7520 (facsimile)

-and-

D. Jarrett Arp  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036-5306  
(202) 955-8500 (telephone)  
(202) 955-8600 (facsimile)  
*Counsel for Martinair Holland N.V.*

/s/ Ronald S. Rolfe

Ronald S. Rolfe  
Rowan Wilson  
CRAVATH, SWAINE & MOORE LLP  
Worldwide Plaza  
825 Eighth Avenue  
New York, NY 10019-7475  
(212) 474-1000 (telephone)  
(212) 474-3700 (facsimile)  
*Counsel for Thai Airways International Public Company Ltd.*

/s/ Robert N. Kaplan

Robert N. Kaplan  
Gregory K. Arenson  
Gary L. Specks  
KAPLAN FOX & KILSHEIMER, LLP  
850 Third Avenue, 14th floor  
New York, NY 10022  
(212) 687-1980 (telephone)  
*Plaintiffs' Lead Counsel*

/s/ Hollis L. Salzman

Hollis L. Salzman

Jay L. Himes

Gregory S. Asciolla

LABATON SUCHAROW LLP

140 Broadway

New York, NY 10005

(212) 907-0700 (telephone)

*Plaintiffs' Lead Counsel*

/s/ Howard J. Sedran

Howard J. Sedran

Austin B. Cohen

LEVIN, FISHBEIN, SEDRAN & BERMAN

510 Walnut Street

Philadelphia, PA 19106

(215) 592-1500 (telephone)

*Plaintiffs' Lead Counsel*

So Ordered

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Victor V. Pohorelsky

United States Magistrate Judge

Dated: \_\_\_\_\_